feiture of the case, and from repossessing itself of the premises. The circuit court found that the lessee was in arrears for a certain amount, and decreed that, on payment of such amount within 10 days, the temporary injunction theretofore issued should be made perpetual, and that on default it should stand dissolved. On appeal, the appellate court reversed that part of the decree requiring payment of such amount, and made the injunction perpetual unconditionally. The Supreme Court, in effect, reversed this decree and affirmed the circuit court; the only difference in the decree directed by the Supreme Court and the original decree of the circuit court being that the time within which the payment was to be made was changed from 10 days to 30 days. On reinstatement of the cause in the circuit court, it rendered a decree following the direction of the Supreme Court. On a second appeal, it was contended that there was error in the decree of the circuit court. In reference to this question, the Supreme Court says in Chicago Railway Equipment Co. *v.* National Hollow Brake-Beam Co., 87 Northeastern Reporter, 872, that a decree entered in accordance with its directions cannot be erroneous; that it may err in its directions to an inferior court, but, however erroneous the directions given may be, it is the duty of that court to strictly follow the directions contained in the mandate. The only question, therefore, which was open to consideration on the second appeal, was whether the decree of the circuit court was in accordance with the mandate of the Supreme Court.

Power of Congress to Punish for Harboring Immoral Alien Women.—The power of Congress to punish the offense of harboring for immoral purposes an alien woman within three years of her entrance of the United States was the question presented in Keller *v.* United States, 29 Supreme Court Reporter, 470. The woman whom defendant was indicted for harboring was merely furnished by him with a place to follow her degraded calling. The Federal Supreme Court held that such regulations were solely within the power of the states, and that for Congress to attempt such legislation in the exercise of a police power would bring us face to face with such a change in the internal conditions of our country as was never dreamed of by the framers of the Constitution.

Right to Withdraw Request for Divorce.—A husband filed a complaint in divorce against his wife, who thereupon filed an answer and a cross-complaint charging him with violation of his marriage obligation, but not praying for a divorce. The jury having found both parties guilty of extreme cruelty, one of the attorneys remarked to another, in their presence, that a verdict had been secured which prevented the granting of a divorce. Thereupon one of the jurors said that it was not his intention to render such a verdict. The jury was

permitted to retire for reconsideration. Counsel for defendant then stated that if the court was going to permit the jury to decide whether the parties should have divorces he would ask leave to amend his cross-complaint to secure one. Leave was granted. By the second verdict the jury found defendant not guilty of extreme cruelty, but found plaintiff guilty thereof. Defendant then refused to amend the cross-complaint in accordance with the permission granted, and moved the court that no decree of divorce be granted, but that plaintiff be required to pay alimony. Motion overruled. In Milliman *v.* Milliman, 101 Pacific Reporter, 58, the Colorado Supreme Court held that it would be contrary to public policy in such a case to permit the decree for divorce to stand. If the defendant did not desire a divorce, there is no power or authority of a court to grant one over her protest.

What Need a Prospective Citizen Know About Our Laws?—A native of Norway, having resided in this country for 24 years and in Minnesota for 18, while being examined as to his qualifications for citizenship, admitted that he did not know where the laws were made, but supposed the Governors made them; that he did not know the purpose of the Constitution, nor the names of the President or the Governor, nor the location of either the state or national capitol. He thought that Washington was President, and that Roosevelt was Governor, but confessed that he was not interested in these particulars. The objection was raised in State *v.* District Court, 120 Northwestern Reporter, 898, to his admission as a citizen, on the ground that he could not agree to support a Constitution of the existence and purport of which he had only a vague consciousness. It appeared that he was a sober, industrious, honest, law-abiding farmer, possessing the respect and confidence of his neighbors. The Supreme Court of Minnesota decided that, if the applicant was otherwise eligible, the fact that he had only a chaotic knowledge of the federal Constitution and form of government would not exclude him.

Negligence in Allowing Car to Be Crowded.—A passenger mounted the platform of a crowded street car, wherefrom he was pushed and injured because of overcrowding. In Lobner *v.* Metropolitan Street Railway Co., 101 Pacific Reporter, 463, defendant contended that plaintiff had voluntarily exposed himself to danger by riding on the platform of a crowded car, a danger which he had the best opportunity to discover and appreciate. The Kansas Supreme Court held, however, that the practice of inviting and permitting passengers to ride on the platforms of street cars is so common that it cannot be held, as a matter of law, that a passenger in doing so is guilty of contributory negligence. One who rides on a crowded car assumes the inconvenience resulting from its crowded condition, but the company is not, for that reason, relieved from the responsibility of using due care for the safety of passengers invited upon the car.